

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BNP PARIBAS S.A., BNP PARIBAS ARBITRAGE
SNC, BNP PARIBAS BANK & TRUST (CAYMAN)
LIMITED, and BNP PARIBAS SECURITIES
SERVICES S.A.,

Defendants.

Adv. Pro. No. 12-01576 (SMB)

[PROPOSED] ORDER ON MOTION TO COMPEL

Upon consideration of plaintiff Irving H. Picard's (the "Trustee") Notice of Motion to Compel, ECF No. __ (the "Motion"), the Trustee's Memorandum of Law in Support of the Motion, ECF No. __, and the Declaration of Jonathan A. Forman in Support of the Motion, ECF No. __; and it appearing that due and proper notice of the Motion and relief requested therein having been given, and no other further notice needing to be given; and a hearing having been

held on the Motion on _____, 2018 (the “Hearing”); and this Court having jurisdiction to consider the Motion under 28 U.S.C. §§ 157 and 1334; and the Court having considered any papers submitted in support of an in opposition to the Motion; the argument of counsel at the Hearing; and the record in this case:

IT IS HEREBY ORDERED, that the motion is **GRANTED** as follows:

1. Defendants are hereby ordered to produce all documents responsive to the requests directed to them, as identified in Exhibit O to the Forman Declaration (*i.e.*, Requests Nos. 1-25, 29, 52, 64, and 84 as set forth in Exhibit B to the Forman Declaration) within thirty (30) days of the entry of this Order; and

2. This Court shall retain jurisdiction to, among other things, interpret and enforce the terms and provisions of this Order.

IT IS HEREBY FURTHER ORDERED, that contemporaneous with such productions, Defendants shall transmit to the Trustee a privilege log (if applicable) identifying the withheld documents and otherwise satisfying the requirements of Local Bankruptcy Rule 7034-1(c)(1) & (2).

SO ORDERED this ____ day of _____, 2018

HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE